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Qwest.

August 13, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, WC Docket No. 02-148

Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Montana, Utah, Washington & Wyoming, WC Docket No. 02-189

Dear Ms. Dortch:

At the request of the Wireline Competition Bureau, Qwest hereby responds to various questions relating to: the definition of PO-3 performance metric, disconnects, reject rates, manually processed orders, CLEC outage notification process, the availability of ATM and Frame Relay Service at wholesale discount, Qwest's provision of loop qualification information, address validation, CLEC Loss and Completion Reports, error codes, UNE-P Star conversion process, telephone number migration and migrate as specified.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
R. Harsch
J. Jewel
P. Baker
C. Post

P. Fahn
B. Smith
J. Myles
J. Stanley
S. Vick
J. Orchard
C. Washburn
S. Oxley

QUESTION:

Explain what a "work week clock hour" is as defined in PO-3.

RESPONSE:

The "work week clock hours" phrase in PO-3C's description and standard refers to 24 hours a day Monday through Friday (excluding Holidays). Unlike PO-3A and PO-3B which is tied to the ISC's hours of operation, for PO-3C if the LSR is received at midnight, the clock or calculation starts at midnight and Qwest has 24 "clock hours" to issue a reject in order for that reject to be considered timely. There is no definition in the record.

QUESTION:

Elaborate on the modification to Qwest's internal procedures to avoid disconnection of DSL service before the due date.

RESPONSE:

Effective July 11, 2002, Qwest covered its Interconnect Service Center personnel on an additional step that representatives must complete. Specifically, for conversion of Qwest retail service with DSL, or existing resale service with DSL service, to UNE-P combination service with DSL, Qwest's representative have been advised to include the FID "ADSL" after the access line USOC on conversion service orders to ensure appropriate assignments are retained for the Qwest DSL service. In performing root cause analysis, Qwest found that without the ADSL FID, the service orders may be completed without the DSL service which results in DSL disconnection in error. From July 12-July 26, 2002, Qwest reviewed 133 conversion orders that included Qwest DSL service and on which the ADSL FID was used, and there were no disconnections of the Qwest DSL service in error.

QUESTION:

The Simpson declaration only addresses DSL disconnects. Is that all Eschelon is complaining about --they appeared to discuss disconnects generically without reference to any particular product.

RESPONSE:

Eschelon has expressed an additional concern regarding a small subset of orders that experienced out-of-service conditions for several hours. This explanation was provided on page 9 of the 8/8/02 ex parte.

QUESTION:

In Attachment LN-18 to the Notarianni-Doherty Reply Declaration, there is a confidential table with New Access, AT&T, and Z-Tel reject rates. Please explain why there are different lengths of time for the data.

RESPONSE:

For its analysis of reject rates of Z-Tel, AT&T, and New Access, Qwest used the most recent data available for each CLEC. In each case Qwest determined the appropriate number of days of rejects to analyze based on circumstances specific to the individual CLEC and the amount of time required to perform the analysis.

Qwest used data for Z-Tel because WorldCom, the party that raised the issue of Pre-order/Order integration and rejects, uses Z-Tel's EDI interface for processing LSRs. When WorldCom first made this allegation, Qwest began to research Z-Tel data. Therefore, by the time the FCC Staff asked Qwest to provide data on reject rates for several CLECs, Qwest had already conducted some analysis of Z-Tel data. Qwest was able to provide an analysis of three months of data for Z-Tel. Therefore, Qwest provided an analysis of Z-Tel's data between 4/19/02 and 7/19/02, the most recent three months of data available.

For New Access, Qwest began the data analysis after the FCC Staff request. New Access had only been certified on EDI to submit LSRs since early June, and therefore, it was not possible to provide the three months of data for New Access. Qwest used the most recent 30 days of data from 6/25/02 to 7/24/02.

For AT&T Qwest also began the data analysis after the FCC Staff request. Because AT&T had significant volumes of LSRs, Qwest provided an analysis of two weeks of data for AT&T. The most recent two weeks of data available at the time, 7/10/02 to 7/25/02, contained enough volumes of LSRs for a complete analysis. Qwest felt there was no reason to go through the expense and effort of reviewing additional weeks of data and delay the response to the FCC Staff.

QUESTION:

Paragraph 89 of the Notarianni-Doherty Reply Declaration states that that enhanced edits were added to the SOP. What was the date?

RESPONSE:

Please find below a listing of SOP edits implemented by Qwest to improve SDC handling of manually processed orders. Please note that the majority of these edits were implemented between January and September of 2001.

UR 981 – Deployed September of 2001 allowing Central Complex orders to sort and post correctly to the CSR in BOSS.
UR 1409 – Deployed in August of 2001 editing orders in the SOP for BAN information in accordance to the BAN in CPS.
UR 2244 – Deployed in January of 2001 to edit for the appropriate TAX entries on a service order with Telephone Assistance Plan (TAP) USOCs.
UR 2301 – Deployed in September of 2001 requiring the RSID or ZCID FID floated behind inward action coded USOCs when there was an RSID or ZCID FID present in the Bill and ID Sections of the service order.
UR 2302 – Deployed July of 2001 allowing the centers to obtain a list of unused MAN numbers for the Western Region Unbundled Loop orders
UR 2303 – Deployed in September of 2001 disallowing FIDs on Wholesale orders that only pertain to Retail accounts for Qwest Calling plans.
UR 2304 – Deployed in September of 2001 requiring the correct market unit identifier on Wholesale orders in the Eastern region.
UR 2305 – Deployed July 2001 requiring appropriate sequencing of RSID or ZCID activity on CLEC to CLEC conversion orders in the Central region
UR 2308 – Deployed October of 2001 requiring the correct FIDs on service orders when manual rating is required in the Eastern region.
UR 2311 – Deployed in September of 2001 requiring the appropriate FID addition or removal with custom choice packages on service orders.
UR 2313 – Deployed in September of 2001 requiring BTN entry on D orders for Unbundled Loop.
UR 2904 – Deployed in March 2002 requiring PON on all Wholesale D orders to show up on Lost & Completion reports.

QUESTION:

Expand more on para. 303 of the Notarianni-Doherty Reply Declaration as to why the CLEC outage notification process should not apply to the Qhost system. How often is there an outage and what are the effects?

RESPONSE:

Qhost is not a CLEC ordering tool. ISPs use Qhost to obtain configuration information such as ATM routing information for Qwest DSL service, whether provided on a retail or resale basis. Eschelon uses Qhost in its capacity as an ISP not in its capacity as a CLEC.

If Qhost is experiencing an outage, ISPs including Eschelon may contact Qwest to obtain the same information available in Qhost from the DSL support center. The number of the DSL support center is published on the Qhost website.

Since Qhost is an ISP tool and not a CLEC ordering system, a Qhost outage would not follow the outage notification process for CLECs negotiated as part of the CMP redesign.

QUESTION:

Are ATM and Frame Relay Service available for resale at a wholesale discount?

RESPONSE:

Qwest made Frame Relay Service (FRS) and Asynchronous Transfer Service (ATM) provided in Qwest's interstate tariff available for resale, at a wholesale discount, effective May 1, 2002. Attached is a copy of the letter (Attachment LAS-1) that was sent to CLECs announcing this policy.

At the time that Qwest made the announcement noted above to CLECs concerning resale of FRS and ATM, Qwest had determined that certain complementary functions that support these services, namely the stand-alone access link and the network-to-network information transfer functions for FRS, and stand-alone optical access link function for ATM, were administrative functions of the FRS and ATM services, and as such, were used only by carriers and not by end users. Accordingly, Qwest initially determined that these complementary functions were available for resale in conjunction with FRS and ATM, but not at a wholesale discount. However, in July, 2002, Qwest announced to CLECS that it would also make these complementary functions available for resale at a wholesale discount. Attached are copies of letters sent to CLECs announcing these changes (Attachments LAS-6 and LAS-7 (these two exhibits were also attached to Lori Simpson's FCC Reply Declaration concerning checklist item 14).

QUESTION:

Cite how many of Qwest's loops are loaded into the Loop Qualification Database (including partial info) and cite the information now in the database to show compliance with the list from the UNE Remand Order.

RESPONSE:

In paragraph 427 of the UNE Remand Order, the FCC clarified that "an incumbent LEC must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent, so that the requesting carrier can make an independent judgment about whether the loop is capable of supporting the advanced services equipment the requesting carrier intends to install." The FCC listed the information that a LEC is required to provide:
(1) the composition of the loop material, including, but not limited to, fiber optics, copper;
(2) the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, disturbers in the same or adjacent binder groups;
(3) the loop length, including the length and location of each type of transmission media;
(4) the wire gauge(s) of the loop;
(5) the electrical parameters of the loop, which may determine the suitability of the loop for various technologies.
The LEC must provide loop qualification information by individual address or by entire wire center.

Qwest provides this information, and other fields of loop make up information, to CLECs. Reply Exhibit LN-1 contains a matrix with a list of the UNE Remand Order requirements and the loop qualification tools that provide the required information. On page 3 of this exhibit, Qwest has described additional functionality of the tools. For example, CLECs can query by telephone number or address, and can obtain information on both working and spare facilities. In addition, the Initial Declaration of Lynn M V Notarianni and Christie L. Doherty, at paragraph 116, describes the web-based tool that CLECs may use to obtain loop information at a wire center level.

Qwest provides this information through its Loop Qualification Tools: Qwest DSL for Resale, Unbundled ADSL Loop Qualification, and the Raw Loop Data Tool. As noted in Footnote 133 of the Initial Declaration on OSS, these tools contain information on more than 90% of Qwest's loops. Qwest also provides a CLEC Job Aid, Exhibit LN-OSS-7 to the Initial Declaration on OSS, to help CLECs understand the tools and data available.

QUESTION:

Does Qwest retail experience inconsistencies between PREMIS and CRIS records?

RESPONSE:

Qwest's PREMIS system is the primary source of address information. The same PREMIS system is used to validate addresses for both wholesale and retail service requests. Qwest's process for "migration" orders requires both wholesale and retail service requests to contain a valid PREMIS address or the service request will not be created. Qwest strongly recommends that CLECs perform a pre-order address validation query [to PREMIS] and use the address obtained when creating an LSR, in order to assure that the LSR will not be rejected due to an invalid address. Any other method of address validation, whether obtained through conversation only with the customer or through another source such as "CRIS records" may cause the LSR to be rejected if the address does not match that in PREMIS. Qwest's retail system requires the use of PREMIS for a customer migration, or similar to the CLEC service request, the retail service request cannot be created.

QUESTION:

Why is the claim that the Loss and Completion Reports issued by Qwest for CLECs do not provide CLECs with the ability to identify which customers have left the CLEC for another carrier specific to one CLEC? Since Qwest retail does not issue Loss and Completion reports in the retail environment, how does Qwest retail learn of customer losses? Does that method provide the same or comparable information as that provided to CLECs in Loss and Completion reports?

RESPONSE:

The issue of the CLEC's inability to identify customers on the loss and completion report who have left the CLEC for another carrier was not specific to Eschelon. This issue was resolved on July 14, 2002 when Qwest implemented a change to its Loss and Completion Reports. Now, end users who move to a different provider can be distinguished from those end users who are changing product but not changing provders. Because Qwest has provided the CLECs the generic PON format that is used when a customer is returning to Qwest, the CLECs can also distinguish between end users who are moving to Qwest versus those who are moving to another CLEC. This customer loss information is driven from the Disconnect Reason Code (RC) from the service order, which is information also available to Retail through similar reports. Retail is limited to accessing the same data that the CLEC is provided in the report.

QUESTION:

Does Qwest track the error codes that go back to CLECs when an order is rejected.

RESPONSE:

Although the information is available in the IMA database for errors , Qwest does not currently track this information.

QUESTION:

Covad asserts that KPMG did not evaluate Qwest's procedures for providing all loop qualification information, i.e. back office record inquiries and speaking with engineers. (See Covad Comments at 14-15.) However, in Test 12.7-1-2, KPMG found that wholesale customers can determine whether a loop qualifies for DSL service by emailing or faxing an inquiry, and that during its evaluation, it observed that Qwest wholesale representatives used various loop qualification tools, including additional process documentation via InfoBuddy. Could InfoBuddy provide the additional loop qualifiaction information that Covad asserts KPMG did not evaluate?

RESPONSE:

Infobuddy Does Not Contain Loop Qualification/Make-Up Information

Infobuddy is a repository for internal methods and procedures (M&Ps) used by both retail and wholesale service centers. Retail methods and procedures do not provide instructions on how to access additional loop qualification and/or makeup information that would otherwise only be available to Qwest engineers. Wholesale Service Delivery Coordinators similarly use Infobuddy to access documentation that describes how to process a pre-order loop qualification query for a CLEC. KPMG likely observed service delivery coordinator's accessing Infobuddy to obtain instructions on how to use the loop qualification tools. The Wholesale M&P's in Infobuddy do not contain additional loop qualification and/or make-up information. That information is available through the loop qualification tools available to the CLECs.

KPMG and HPC Evaluated All Loop Qualification Tools

During the course of the OSS third party test, both functionality and process were evaluated with respect to the loop qualification tools. In Test 12.7, KPMG evaluated the three wholesale loop qualification tools: Qwest DSL for Resale, Unbundled ADSL Loop Qualification, and the Raw Loop Data Tool. In addition, they evaluated the Qwest DSL tool used by the retail organization. In section 2.1.3 (Qwest Wholesale Loop Qualification Process) of the Test 12.7 portion of the Final Report, KPMG described all of the loop qualification tools, along with their functionalities and query responses. In section 2.1.4, KPMG evaluated the systems flow of each of the tools to ensure that all of the tools used the same source for data, the LFACS database.

In Test Cross-Reference 12.7-1-1, KMPG noted that the requirements for the Loop Qualification Tools were in the IMA Loop Qualification and Raw Loop Data CLEC Job Aid (attached as Exh. LN-OSS-7 to the Initial Declaration of Lynn M V Notarianni and Christie L. Doherty). KPMG went on to state that they also

observed the loop qualification process in order to confirm that that these processes were accurately and consistently practiced, as defined earlier in the document (the CLEC job aid was one of the documented processes evaluated).

In Test Cross-Reference 12.7-1-2, KPMG determined that Qwest wholesale customers use various loop qualification tools, via IMA, to obtain comparable information for their end-users. In Test Cross-Reference 12.7-1-7, KPMG found that the systems and processes are in place to allow qualification by telephone number. KPMG further found that all tools (the Qwest DSL Tool, the ADSL Unbundled Loop Tool, and the Raw Loop Data Tool for Wholesale and the QCity/QServ Tool for Retail) may be used to conduct loop qualifications based on address. In order to make this determination, KPMG had to evaluate all of the tools.

Additionally, in Test 12, HPC also evaluated the Raw Loop Data Tool. Table 12-1: Pre-Order Test Scenarios lists "Obtain Loop Qualification Information (RLDQ)" and "Perform Facility Availability Check (which included ADSL-qualified facility availability)." In section 2.4.1, HPC stated it "analyzed pre-order and order field content and field formats to evaluate compliance with the Qwest business rules." In Test Cross-Reference 12.2-1 (under the category of Pre-Order Process Accuracy and Completeness), HPC confirmed that after retest, it "was able to perform the RLDQ successfully" and obtain the required loop information either by telephone number or address.

Neither KPMG nor HPC evaluated whether the data returned via the Loop Qualification Tools was all of the information necessary to qualify a loop for xDSL service. This evaluation occurred at the state workshops where the CLECs, including Covad, were able to represent their views.

Qwest Provides Loop Information Required by the UNE Remand Order

In paragraph 427 of the UNE Remand Order, the FCC listed the information that a LEC is required to provide:

(1) the composition of the loop material, including, but not limited to, fiber optics, copper;

(2) the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, disturbers in the same or adjacent binder groups;

(3) the loop length, including the length and location of each type of transmission media;

(4) the wire gauge(s) of the loop;

(5) the electrical parameters of the loop, which may determine the suitability of the loop for various technologies.

Qwest provides this information, and other fields of loop make up information, to CLECs. Reply Exhibit LN-1 contains a matrix with a list of the UNE Remand Order requirements and the loop qualification tools that provide the required information. On page 3 of this exhibit, Qwest has described additional functionality of the tools. For example, CLECs can query by telephone number or address, and can obtain information on both working and spare facilities. In addition, the Initial Declaration of Lynn M V Notarianni and Christie L. Doherty, at paragraph 116, describes the web-based tool that CLECs may use to obtain loop information at a wire center level.

Qwest provides this information through its Loop Qualification Tools: Qwest DSL for Resale, Unbundled ADSL Loop Qualification, and the Raw Loop Data Tool. Qwest also provides a CLEC Job Aid, which is attached as Exhibit LN-OSS-7 to the Initial Declaration on OSS, to help CLECs understand the tools and data available.

Covad Agrees That the Raw Loop Data Tool Provides it with all the Categories of Information it Needs.

In Footnote 55 of the Reply Declaration on OSS, Qwest noted that Covad stated that the Raw Loop Data Tool provides it with all categories of information it needs to determine if a loop will support its DSL service. "Covad has never invoked any technical differences between its DSL products and that offered by any other entity to suggest that the [Raw Loop Data Tool] should provide different or additional types or categories of information. Covad has never stated in any testimony or brief that the categories of information provided by the [Raw Loop Data Tool] are insufficient for it to determine whether a loop meets Covad's technical needs." Qwest attached the Covad Response to Qwest Motion to Compel Responses, MPUC Docket No. P-421/CI-01-1371, July 24, 2002, to the Reply Declaration on OSS as Reply Exhibit LN-2.

In its Response to Qwest Motion to Compel Responses, Covad states that its only concern deals with the accuracy of the data provided by Qwest in the Loop Qualification Tools. This issue is addressed by the manual loop qualification process that Qwest has implemented. As described in paragraphs 69 - 71 of the Reply Declaration for OSS, under the manual loop make-up process, CLECs may obtain loop make-up information if the Raw Loop Data Tool or Loop Qualification Tool provide incomplete or unclear loop make-up information for a particular address or telephone number or if the CLEC demonstrates that the loop information returned may be inaccurate. In any of these situations, Qwest will perform a manual search of its back office records, systems, and databases where loop information resides to obtain loop make-up information. Qwest will provide a response via e-mail within 48 hours. Qwest will then update the applicable databases with the loop make-up information. Through this process, CLECs can request that Qwest investigate perceived inaccuracies.

QUESTION:

Describe the resale-to-UNE-P conversion process; discuss billing differences, changes in back office systems, differences in M&R, any performance metric changes, and anything else that is handled differently. Pricing situation appears to be something FCC does not want to get into, however FCC is wondering why there is a true-up, as discussed in reply comments. Also, how do we categorize something as UNE-P (definition of UNE-P) and what are the UNE-P flavors? What happens to all UNE-P Star data; is it all part of UNE-P instead of resale and when did that happen? When did McLoed transition occur?

RESPONSE:

There have been a number of questions raised asking for clarifications between the processing and reporting of Resale, UNE-Star (also referred to as UNE-E or UNE-M) and UNE-P services. All three product categories have very similar characteristics from a provisioning perspective but have varying features, usage and billing methodologies.

Qwest originally offered Resale and UNE-P services. After negotiations with both Eschelon and McLeod, a new set of UNE combination services were created and added to their interconnection agreements effective 10/01/00 for Eschelon and 10/01/00 for McLeod, known as UNE-Star. The UNE-Star product set includes Business POTS, Centrex 21, Centron and Centrex Plus.[1]

Resale and UNE-P LSRs are very similar. These requests use the same LSR forms, the same fields contained on those forms and are distinguished predominantly by the Request Type (REQTYP) field on the LSR form. However, once the LSR is converted into a service order, the provisioning process is virtually the same. In implementing UNE-Star, the decision was made to mirror the resale ordering process.[2] This was viewed favorably by the CLECs because it allowed them to continue using the Resale processes that were already in place in their ordering centers. Qwest agreed to do the work necessary to accept what appeared to be a resale LSR for these four products and do the necessary work to actually provide the UNE-Star product, including sending the access usage information that is not provided under resale. From the CLECs' perspective they understood, based upon their contract, they would submit resale LSRs [3] for these four products with the intent of having Qwest provision a type of UNE-P.

From a billing perspective, the CLECs and Qwest negotiated the initial billing methodology to be used for UNE-Star. In order to fully automate the UNE-Star billing, system changes had to be made in major releases of both IMA and CRIS. The CRIS system changes were made in September 2001; IMA changes were scheduled for IMA 9.0. [4] Additional CRIS work to convert the existing embedded base of accounts was scheduled for 3/8/02. During January 2002, conversations were underway with Eschelon and McLeod concerning a shift in focus from UNE-Star to UNE-P.[5] Because of these negotiations, Qwest postponed the additional IMA and CRIS

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[1] Qwest clarified on 7/1/02, that existing UNE-Star services can be used by CLECs to serve both business and residential customers.
[2] The conversion of the embedded base was managed outside the LSR process.
[3] Use of resale LSRs was negotiated as an interim step until UNE-Star billing could be automated and CLECs could train and transition their ordering personnel on the long-term process. The long term process has not been adopted by either CLEC.
[4] IMA 9.0 was deployed in February 2002. Although the generic changes for UNE-Star ordering were implemented in IMA 9.0, the CLEC specific changes will be implemented in conjunction with CLEC agreement to adopt the long-term process.
[5] In fact, an agreement was signed with Eschelon on 3/1/02 stating that a joint team would be formed within 10 days to develop a UNE-E to UNE-P conversion plan.

work and left the initial billing methodology in place. This involves billing the account at resale rates and providing a credit for the difference between the billed rates and the UNE-Star rates.

Qwest determined, in the fall of 2001, that it had been including UNE-Star in UNE-P volumes in its state 271 Checklist workshops but had continued to report them in PID results as Resale. For example, both a UNE-Star order and repair ticket were listed as Resale. Qwest corrected this by moving the UNE-Star volumes for the four products identified above from the Resale product reporting to the UNE-P product reporting. Any other resale products ordered by McLeod and Eschelon, such as Resale ISDN, continued to be reported in the Resale results. Qwest recast the data back to October 2001 results and on a going forward basis to assure a match between reporting ordering, provisioning and repair results in the same manner as Qwest reports volumes in service.

QUESTION:

1) Describe why lack of telephone number (TN) migration and migration without specifying end-state features does not impede CLECs' ability to compete. Provide citations to LSOC and other filed documents.
2) Provide the scope and circumstances around which multiple LSRs are sent to CLECs.
3) Briefly describe the status of the 2 related WorldCom CRs.

RESPONSE:

When Qwest first implemented IMA EDI and the IMA GUI, conversions "as specified" did not require specification of the existing features that would not remain – the CLEC was required to specify only the features that would remain after the conversion was completed. However, CLECs and Qwest experienced significant problems. CLECs would not always pull the CSR to see what was on the account, and Qwest received a significant number of contacts to the Repair Center because features were discontinued. As a result, concurrent with release IMA 6.0 in February 2001, Qwest changed the process and required CLECs to identify what would happen to each feature during a conversion as specified.

The evidence demonstrates that this process is not impeding CLECs' ability to submit LSRs. For example, for the month of June, Qwest processed 9,799 LSRs migrating accounts as specified to UNE-P POTS. Additionally, if CLECs develop interfaces that are integrated between pre-order and order, the features from the CSR should be automatically populated into the LSR, and the CLEC representative can indicate which features to retain with very little effort.

Further, CLECs did not submit a CR to change this process until June 7, 2002, when SCR060702-01 (Migrating Customers Using the Conversion As Specified Activity Type) was submitted. Qwest has determined that this CR can be implemented in two phases. The first phase can be implemented under the CMP guidelines for a Level 1 process change. The first phase would eliminate the process requirement for a UNE-P conversion-as-specified LSR to identify those features from the existing account that the CLEC does not want on the new account. Qwest will provide the notice and implement on 08/15/02. The second phase of the CR is to no longer require the LSR to differentiate between features that are being retained from the existing account and features that are being added as part of the conversion. This change does require CLEC system changes and must be disclosed for implementation in an IMA release. This CR has been prioritized as number two on the priority list for IMA 12.0 implementation.

A related CLEC CR, SCR061302-01 (Migrate UNE-P Customers By TN), was prioritized as number nineteen on the priority list for the IMA 12.0 implementation. Both of these CRs are subject to the following CMP steps:

> The next step in the CMP calls for Qwest to define business and functional specifications. The specifications are completed on a per CR basis, in priority order. During this phase, any CRs that have affinities and may be more efficiently implemented together will be discussed with the CLECs. CRs with affinities are defined as CRs with similarities in functions or software components. Qwest will also present any complexities, changes in CR size, or other concerns that may arise during this phase that would impact the implementation of a CR. During this phase, CRs may be modified or new CRs may be added with a request that the CRs be considered for addition to the release candidate list. To include a new or modified CR at this point requires approval by the CMP participants.
>
> At the conclusion of business and system requirements, Qwest will present packaging options (if more than one option is available) for implementing the release CRs.

Packaging options are defined as different combinations of CRs proposed for continuing through the next phase of development.

Options may be identified due to affinities in candidates, or resource constraints that prevent some CRs from being implemented but allow others to be completed. If more than one option is available, a vote will be taken. The option with the largest number of votes will continue through the design phase of the development cycle. The discussion regarding packaging options for the IMA 12.0 Release is planned for November 21, 2002.

After design, Qwest will present a final list of CRs that can be implemented. These CRs become the committed CRs for the release. The discussion regarding committed CRs is planned for December 19, 2002.

IMA 12.0 is scheduled for April 7, 2003 implementation. The Exception Process, specified in Section 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release. However, no CLEC has requested that either of these CRs be worked as an exception and implemented prior to the IMA 12.0 Release.

CLECs also claim that the return of multiple CSRs during pre-order makes Qwest's practice of requiring all features even more difficult. While it is true that there are circumstances where IMA will return multiple CSRs for a CLEC to select from, this occurrence is limited[1] and does not impede CLECs from being able to submit a complete and accurate conversion LSR.

When a CLEC requests a CSR based on a 10-digit telephone number, IMA searches Qwest's billing systems (BOSS or CARS depending on region) for matches to the telephone number. When Qwest finds the telephone number on more than one account, it looks at the status and type of accounts involved to determine if it can isolate the correct CSR to return to the CLEC.

Accounts can contain one of three statuses:

- Live: The account is active
- Final: The account has been disconnected and a final bill has been rendered
- Blank: This occurs on recently established accounts that have not been through a bill cycle

IMA returns multiple CSRs when it encounters more than one account in "live" status. This occurs when a telephone number has experienced a change in billing recently (i.e., a change in bill responsibility between retail customers, a consolidation/deconsolidation of accounts, or a change in local service providers). The old account remains in live status until the final bill has been rendered.

Since this scenario is limited in duration to the period of time between the change occurring and the next bill date, the opportunity to encounter this circumstance is also limited. However, when encountered, the CLEC can review the two accounts to determine which is the most current. Once the CLEC has selected the actual live account, the process is the same.

[1] Qwest analyzed how often multiple CSRs were returned in response to a CSR request between July 1, 2002, and August 4, 2002.. Multiple CSRs were returned on 3.1% of the requests through IMA 10.0 (EDI and GUI combined), on 4.8% of the requests through IMA EDI 9.0, and on 5.0% of the requests through IMA EDI 8.0.

In summary, we are not impeding any CLEC's ability to compete as we continue to process these types of orders while encouraging CLECs to utilize the integration steps and at the same time, work on implementing upcoming process modifications through the CMP process.